DAVIS, PARRY, TYLER & WRIGHT

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Attorney for Defendant Verizon

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KATHY L. OAKES : Civil Action No. 02-2749

:

VS.

:

HENKELS AND McCOY, et al

ANSWER OF DEFENDANT, VERIZON (FORMERLY KNOWN AS BELL ATLANTIC) TO NEW MATTER/CROSSCLAIM OF PGW

Denied. Verizon specifically denies liability to Plaintiff as well as denies joint and several liability and/or liability over to PGW for contribution or indemnification. Accordingly, all allegations of this crossclaim are denied.

WHEREFORE, Verizon demands judgment in its favor.

DAVIS, PARRY, TYLER & WRIGHT

By:		

CHRISTOPHER H. WRIGHT, ESQUIRE Attorney for Defendant, Verizon

CERTIFICATE OF SERVICE

I, Christopher H. Wright, Esquire, hereby certify that a true and correct copy of the foregoing *Answer of Defendant, Verizon (formerly known as Bell Atlantic) to New Matter/Crossclaim of PGW* was served on the following counsel of record and unrepresented parties by first class U.S. mail, postage prepaid:

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CHRISTOPHER H. WRIGHT, ESQUIRE Attorney for Defendant, Verizon

Date: July 8, 2002